

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, et al.,

Debtors.¹

Case No. 23-10063 (SHL)

Chapter 11

(Jointly Administered)

**SIXTH STIPULATION AND
AGREED ORDER FURTHER EXTENDING TIME
TO TAKE ACTION, TO THE EXTENT NECESSARY, TO
DETERMINE THE NONDISCHARGEABILITY OF A DEBT OWING
TO A GOVERNMENTAL UNIT PURSUANT TO 11 U.S.C. §1141(d)(6)**

WHEREAS, the Parties² entered into that certain *Stipulation and Agreed Order Extending Time to Take Action, to the Extent Necessary, to Determine the Nondischargeability of a Debt Owning to a Governmental Unit Pursuant to 11 U.S.C. §1141(d)(6)* [ECF No. 418] dated June 12, 2023 (the “First Stipulation”), extending the date by which the Governmental Parties must file their complaint or take action that may be required, if any, in these Chapter 11 Cases to determine the nondischargeability of a debt, pursuant to Section 1141(d)(6) or Section 523 of the Bankruptcy Code to July 31, 2023 (“Nondischargeability Deadline”), which was approved by the Court on July 12, 2023 [ECF No. 494];

1 The Debtors in these Chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the First Stipulation.

WHEREAS, on July 25, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to August 31, 2023 [ECF No. 541], which was approved by the Court on August 10, 2023 [ECF No. 593] (the “Second Stipulation”);

WHEREAS, on August 29, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to September 29, 2023 [ECF No. 630], which was approved by the Court on October 2, 2023 [ECF No. 769] (the “Third Stipulation”);

WHEREAS, on September 29, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to October 31, 2023 [ECF No. 764], which was approved by the Court on October 23, 2023 [ECF No. 826] (the “Fourth Stipulation”);

WHEREAS, on October 31, 2023, the Parties stipulated to further extend the Nondischargeability Deadline to November 30, 2023 [ECF No. 871] (the “Fifth Stipulation”);

WHEREAS, the Governmental Parties now seek a further extension of the Nondischargeability Deadline, and without binding precedent in this jurisdiction on this issue, and in order to avoid unnecessary litigation, the undersigned parties nonetheless jointly seek a further extension of the Section 523(c)/Rule 4007(c) deadline out of an abundance of caution, without prejudice to the Governmental Parties’ right to seek further extensions (this “Sixth Stipulation”);

Based on the foregoing stipulation of the parties, it is ORDERED that:

1. To the extent Section 523(c) or Rule 4007(c) applies, the date by which the Governmental Parties must file their complaint or take other action that may be required, if any, in these Chapter 11 cases to determine the nondischargeability of a debt, pursuant to Section 1141(d)(6) or Section 523 of the Bankruptcy Code, shall be December 29, 2023, or such later

date as may be ordered by the Court, without prejudice to the Governmental Parties' right to seek further extensions of the date.

2. This Sixth Stipulation represents the entire agreement by and between the Parties with respect to the subject matter hereof, and all prior understandings or agreements, if any, are merged into this Sixth Stipulation.

3. Other than as set forth in paragraphs 1 and 2 hereof, nothing in this Sixth Stipulation shall, or is intended to, modify any terms, conditions or provisions of the First Stipulation, the Second Stipulation, the Third Stipulation, the Fourth Stipulation, or the Fifth Stipulation and all such terms, conditions and provisions of the First Stipulation, the Second Stipulation, the Third Stipulation, the Fourth Stipulation, and the Fifth Stipulation shall continue to apply to this Sixth Stipulation.

IT IS SO ORDERED.

Dated: December 18, 2023
White Plains, New York

/s/ Sean H. Lane
THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

IN WITNESS WHEREOF, the Parties, by their respective authorized counsel, have
executed this Sixth Stipulation as of the date written below:

Dated: November 27, 2023
New York, New York

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